

**UNITED STATES DISTRICT COURT
SOUTHERN DISCTICT OF NEW YORK**

JAMES F. THOMPSON)

)

Plaintiff,)

)

v.)

)

ZIMMER BIOMET HOLDINGS, INC. f/k/a)

Case No. 1:19-cv-00310-PAC

ZIMMER HOLDINGS, INC., ZIMMER)

)

BIOMET, INC. f/k/a ZIMMER, INC., and)

)

ZIMMER BIOMET US, INC. f/k/a)

)

ZIMMER US, INC.)

)

Defendants.)

AGREED MOTION FOR SUBSTITUTION AND WITHDRAWAL OF COUNSEL

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

PLEASE TAKE NOTICE that the Johnson Law Group, by and through its undersigned counsel, respectfully moves this Court for entry of an order withdrawing David P. Matthews, the current counsel for client in the above-referenced matter, and substituting Rachal G. Rojas as counsel of record.

This substitution of counsel has been agreed to by attorney David. P. Matthews and is not sought for purposes of delay.

Accordingly, the Johnson Law Group respectfully requests that the Court enter an order withdrawing David P. Matthews as counsel and substituting Rachal G. Rojas as counsel.

The undersigned also requests that an order be entered removing David P. Matthews from future ECF filing notifications for the above referenced matter as well as in the main MDL case - 1:18-md-02859-PAC In Re: Zimmer M/L Taper Hip Prosthesis or M/L Taper Hip Prosthesis with

Kinectiv Technology and Versys Femoral Head Products Liability Litigation.

Date: February 12, 2019

Respectfully submitted,

/s/ Rachal G. Rojas

Rachal G. Rojas

RRojas@JohnsonLawGroup.com

Texas State Bar No.: 24063161

Federal Bar No.: 1005606

JOHNSON LAW GROUP

2925 Richmond Avenue, Suite 1700

Houston, Texas 77098

Tel: (713) 626-9336

Fax: (800) 731-6018

ATTORNEYS FOR PLAINTIFF

AGREED:

/s/ David P. Matthews

David P. Matthews

Dmatthews@thematthewslawfirm.com

Federal Bar No.: OT.017254

THE MATTHEWS LAW FIRM

2905 Sackett Street

Houston, Texas 77098

Tel: (713) 522-5250

Fax: (713) 535-7186

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing was delivered to the involved parties, by the CM/ECF system.

/s/ Rachal G. Rojas
Rachal G. Rojas